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5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

7 VANESSA AOUN,)	2:24-cv-1465-APG-DJA
Individually,)	
8)	
Plaintiff,)	
9)	
vs.)	
10)	
CITY OF LAS VEGAS, a Nevada)	
11 municipality,)	
DOES 1-10, inclusive; ROE)	
12 CORPORATIONS 1-10, inclusive,)	
13)	
Defendants.)	

14
15 **STIPULATION TO EXTEND DISCOVERY PLAN AND SCHEDULING**
16 **ORDER DATES**
(First Request)
(Submitted in Compliance with LR-26-b)

17 The Plaintiff, VANESSA AOUN, by and through her undersigned counsel, KIRK
18 T. KENNEDY, ESQ., and the Defendant, CITY OF LAS VEGAS, by and through its
19 undersigned counsel, Timothy J. Geswein, Deputy City Attorney, hereby submit this first
20 request to extend the Scheduling Order and Discovery Plan dates. For the reasons stated
21 herein, the parties request a 90 day extension from the current discovery deadline of
22 February 24, 2025.

23 **DESCRIPTION OF ACTION:** This is a federal discrimination matter related to
24 Plaintiff's employment with the Defendant. The Defendant denies all claims for relief.

25 **1. Discovery Completed To Date:**

26 The parties have exchanged all initial production. The Plaintiff has served
27 interrogatories which the Defendant has answered. The Defendant has served
28 interrogatories which are pending being answered by the Plaintiff.

1 The Court may recall that at the prior hearing on November 27, 2024, ECF 19,
2 regarding the Defendant's motion to stay discovery, the Court was advised of a relevant
3 Ninth Circuit appeal pending which may have impact upon this matter. Aoun's prior case
4 against the Defendant City under case number 2:22-cv-1751-GMN-EJY is now on appeal
5 at the Ninth Circuit under appeal case number 24-1537. The Ninth Circuit has scheduled
6 oral argument on that related matter for April 2, 2025.

7 The resolution of that appeal matter may have relevance to the factual issues
8 raised in this case, as the parties advised the Court previously on November 27, 2024.
9 The discovery completed in case number 22-1751 may be utilized in this matter and does
10 not need to be duplicated by the parties.

11 At the hearing on November 27, 2024, this Court did partially grant the City's
12 motion to stay discovery. The parties were allowed to proceed with written discovery only
13 as a result of that Order, which remains in effect.

14 **2. Discovery that remains to be completed:**

15 Given the reliance by both parties on the prior discovery completion in 22-1751,
16 the parties have limited discovery to complete in this matter which may include the
17 Plaintiff's deposition by the Defendant City and the Plaintiff may take 2-3 depositions of
18 City personnel involved in her termination of employment which is the basis of her
19 pending retaliation claims. However, given the Court's partial granting of the City's
20 motion to stay discovery on November 27, 2024, the parties are stayed at the present
21 from taking any depositions, as only written discovery is allowed at this time.

22 **3. Reasons why discovery has not been completed to date:**

23 While the parties may only need to conduct a limited number of depositions, there
24 remains uncertainty with the upcoming decision from the Ninth Circuit in the referenced
25 appeal. The appeal decision may address the matters raised in this case, which may moot
26 any further discovery. However, if the Ninth Circuit grants Aoun's appeal, that decision
27 may have bearing on the necessity for additional discovery in this matter.

28 The parties agree that by extending this matter for 90 days from February 24,
2025, the Ninth Circuit will have issued a written decision within this time frame, as the

oral argument date is now confirmed for April 2, 2025. The Ninth Circuit should issue its decision within 30 days of the April 2, 2025, oral argument setting. The decision may create the necessity for additional discovery in this matter.

Based on this procedural status, the parties move that this stipulation is entered into in good faith and not for any improper purpose nor unnecessary delay. All aspects of the Court's order partially staying discovery remain in effect.

PROPOSED DISCOVERY SCHEDULE:

1. Estimated time required for remaining discovery: The parties request a discovery extension of 90 days from the current discovery deadline of February 24, 2025, to a new deadline date of May 27, 2025 (the 90th day is Sunday, May 26, 2025 and the federal Memorial Day holiday is Monday, May 27, 2025).

2. The parties shall have until June 26, 2025 to file dispositive motions. This is 30 days after the discovery cut-off date and does not exceed the outside limit of thirty (30) days following the discovery cut-off date that LR 26-1(e)(4) presumptively sets for filing dispositive motions.

3. The pretrial order shall be filed by July 28, 2025 (the 30th day is Saturday, July 26, 2025), which is not more than thirty (30) days after the date set for filing dispositive motions in the case. This deadline is suspended if dispositive motions are timely filed and, in such case, the deadline for filing the pretrial order shall be thirty (30) days after decision on said dispositive motions, or by further order of the court. The disclosures required by FRCP Rule 26 (a)(3) shall be made in the joint pretrial order.

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Dated: 1/30/25

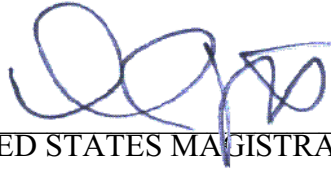
Dated: 1/30/25

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ORDER

IT IS SO ORDERED that the parties' Stipulation to Extend Discovery Plan and Scheduling Order Dates (ECF No. 20) is GRANTED.

DATED: 2/3/2025



UNITED STATES MAGISTRATE JUDGE

Submitted by:

/s/Kirk T. Kennedy
KIRK T. KENNEDY, ESQ.
Nevada Bar No: 5032
Attorney for Plaintiff